

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	Case No. 23-cv-1851
)	
v.)	
)	
Cook County Sheriff Thomas Dart, et al.)	Judge Tharp, Jr.
)	
Defendants.)	
)	

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE
TO DEPOSE AN INCARCERATED INDIVIDUAL**

NOW COMES Defendants, COOK COUNTY SHERIFF THOMAS DART and COOK COUNTY, by and through their attorneys, Troy S. Radunsky and Jason E. DeVore, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 30(b)(2), and respectfully requests leave to take the deposition upon oral examination of witness Marquis D. Watkins, who is confined at Cook County Department of Corrections, and in support, states as follows:

1. Counsels for all other parties have advised that they do not object to the requested deposition and have agreed to its occurrence on January 25, 2024, at 10 AM.
2. Marquis D. Watkins is a witness in this case who has information critical to claims made by Plaintiff in his Complaint at Law, as well as potentially relevant to the ultimate damages at issue in this case.
3. Crucially, Marquis D. Watkins is alleged to have been present at the February 18, 2023, ramp incident at issue in Plaintiff's Complaint.
4. The information sought relates to the time when Plaintiff and witness Marquis D. Watkins were both detainees with the Cook County Department of Corrections in the same living tier.

5. Marquis D. Watkins is currently in the custody of the Cook County Department of Corrections.
6. Defendants now seek to depose Marquis D. Watkins regarding information and details related to Plaintiff's asserted claims.

WHEREFORE, the parties respectfully request that this Honorable Court enter an order allowing them to take the remote Zoom deposition of witness Devonte, currently detained by the Cook County Department of Corrections.

Respectfully Submitted,

Defendants

By: /s/ Troy S. Radunsky
Troy S. Radunsky, One of the
Attorneys for Defendants

DEVORE RADUNSKY LLC

Jason E. DeVore (ARDC # 6242782)
Troy S. Radunsky (ARDC # 6269281)
Zachary G. Stillman (ARDC # 6342749)
230 W. Monroe Street, Ste. 230
Chicago, IL 60606
(312) 300-4479 telephone
jdevore@devoreradunsky.com
tradunsky@devoreradunsky.com
zstillman@devoreradunsky.com

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that **Defendants' Motion for Leave to Depose an Incarcerated Individual** was filed on December 18, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman